

EXHIBIT 22

From: Michele Murphy <michele@oandzlaw.com>
Sent: Friday, December 6, 2024 12:14 PM
To: Victorson, Holly (DC); Jeff Kane; Kevin Lindsey; Uriel Lee
Cc: Damle, Sy (DC-NY); Tomkowiak, Sarah (DC); Stillman, Alli (NY); Wetzel, Joe (Bay Area); Bladow, Laura (DC); Sampoli, Sara (DC); Buettner, Thomas (CH)
Subject: Re: Cengage v. Google:
Attachments: 2024.12.06 Cengage v. Google - Domains Noticed through 2024.08.12 identifying WIS.xlsx; Screenshot 2024-12-06 at 12.05.18 PM.png

Counsel,

For purposes of the discovery dispute, attached is an updated spreadsheet regarding the domains in plaintiffs' notices identifying a work in suit (WIS) through 8.12.24. There is one additional domain on this spreadsheet compared to yesterday's version (chanhchua-store.myspreadshop.com, row 251). We are working on supplementing this with more recent notice information. We expect to have this updated list next week.

Also, on this spreadsheet we have swapped the information in column B for what we believe might be a more readily searchable data field. Whereas yesterday's version contained the first part of the domain name without the extension, this version includes the name of the infringing merchant that appears on the ad (e.g., "D-Heart" in the attached screenshot from today).

Please let us know if you have any questions. Thanks, Michele

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From: Michele Murphy <michele@oandzlaw.com>
Date: Thursday, December 5, 2024 at 1:04 PM
To: "Holly.Victorson@lw.com" <Holly.Victorson@lw.com>, Jeff Kane <JKane@oandzlaw.com>, Kevin Lindsey <KLindsey@oandzlaw.com>, Uriel Lee <ULee@oandzlaw.com>
Cc: "Sy.Damle@lw.com" <Sy.Damle@lw.com>, "Sarah.Tomkowiak@lw.com" <Sarah.Tomkowiak@lw.com>, "Alli.Stillman@lw.com" <Alli.Stillman@lw.com>, "Joe.Wetzel@lw.com" <Joe.Wetzel@lw.com>, "Laura.Bladow@lw.com" <Laura.Bladow@lw.com>, "Sara.Sampoli@lw.com" <Sara.Sampoli@lw.com>,

"Thomas.Buettner@lw.com" <Thomas.Buettner@lw.com>

Subject: Re: Cengage v. Google:

Counsel,

In some cases, there is a difference between a notice to Google identifying a website and a work-in-suit versus a notice identifying a website and an infringing work that is not a work-in-suit (e.g., due to a registration issue), but the merchant was also selling a work-in-suit. For the attached spreadsheet, we can confirm for purposes of this discovery dispute that it is our understanding that the answer to both of your questions is yes (except we would use the term "selling" rather than "hosting"), i.e., the data show that a work-in-suit is in the notice. We would need more time to answer as to the others. We also added a column for just the first part of the domain name, e.g., without the extension, since that is one of the fields we would like Google to search. We will be following up shortly regarding the larger issues involved in the dispute.

Thanks,
Michele

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From: "Holly.Victorson@lw.com" <Holly.Victorson@lw.com>
Date: Thursday, December 5, 2024 at 10:37 AM
To: Michele Murphy <michele@oandzlaw.com>, Jeff Kane <JKane@oandzlaw.com>, Kevin Lindsey <KLindsey@oandzlaw.com>, Uriel Lee <ULee@oandzlaw.com>
Cc: "Sy.Damle@lw.com" <Sy.Damle@lw.com>, "Sarah.Tomkowiak@lw.com" <Sarah.Tomkowiak@lw.com>, "Alli.Stillman@lw.com" <Alli.Stillman@lw.com>, "Joe.Wetzel@lw.com" <Joe.Wetzel@lw.com>, "Laura.Bladow@lw.com" <Laura.Bladow@lw.com>, "Sara.Sampoli@lw.com" <Sara.Sampoli@lw.com>, "Thomas.Buettner@lw.com" <Thomas.Buettner@lw.com>
Subject: RE: Cengage v. Google:

Thank you, Michele. Can you please confirm that (1) these domains represent domains identified in notices from, or on behalf of, Plaintiffs to Google; and (2) each domain listed allegedly hosted an infringing copy of at least one of the asserted works in Appendix A of the First Amended Complaint?

Thanks,
Holly

Holly Victorson

Pronouns: she/her/hers

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From: Michele Murphy <michele@oandzlaw.com>

Sent: Thursday, December 5, 2024 8:46 AM

To: Victorson, Holly (DC) <Holly.Victorson@lw.com>; Jeff Kane <JKane@oandzlaw.com>; Kevin Lindsey <KLindsey@oandzlaw.com>; Uriel Lee <ULee@oandzlaw.com>

Cc: Damle, Sy (DC-NY) <Sy.Damle@lw.com>; Tomkowiak, Sarah (DC) <Sarah.Tomkowiak@lw.com>; Stillman, Alli (NY) <Alli.Stillman@lw.com>; Wetzel, Joe (Bay Area) <Joe.Wetzel@lw.com>; Bladow, Laura (DC) <Laura.Bladow@lw.com>; Sampoli, Sara (DC) <Sara.Sampoli@lw.com>; Buettner, Thomas (CH) <Thomas.Buettner@lw.com>

Subject: Re: Cengage v. Google:

Counsel,

Here is the updated list of domains noticed through 12.3.24. Some of these include domains noticed before 8.12.24 that were not on yesterday's list because they were sent by a different vendor. Please let us know if you have questions.

Thanks, Michele

Michele H. Murphy

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From: Michele Murphy <michele@oandzlaw.com>

Date: Wednesday, December 4, 2024 at 5:13 PM

To: "Holly.Victorson@lw.com" <Holly.Victorson@lw.com>, Jeff Kane <JKane@oandzlaw.com>, Kevin Lindsey <KLindsey@oandzlaw.com>, Uriel Lee <ULee@oandzlaw.com>

Cc: "Sy.Damle@lw.com" <Sy.Damle@lw.com>, "Sarah.Tomkowiak@lw.com" <Sarah.Tomkowiak@lw.com>, "Alli.Stillman@lw.com" <Alli.Stillman@lw.com>, "Joe.Wetzel@lw.com" <Joe.Wetzel@lw.com>, "Laura.Bladow@lw.com" <Laura.Bladow@lw.com>, "Sara.Sampoli@lw.com" <Sara.Sampoli@lw.com>, "Thomas.Buettner@lw.com" <Thomas.Buettner@lw.com>

Subject: Re: Cengage v. Google:

Counsel,

For purposes of the discovery dispute, here is the list of domains noticed through 8.12.24. We will work on supplementing this for subsequent notices.

Thanks, Michele

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From: "Holly.Victorson@lw.com" <Holly.Victorson@lw.com>
Date: Wednesday, December 4, 2024 at 4:58 PM
To: Jeff Kane <JKane@oandzlaw.com>, Michele Murphy <michele@oandzlaw.com>, Kevin Lindsey <KLindsey@oandzlaw.com>, Uriel Lee <ULee@oandzlaw.com>
Cc: "Sy.Damle@lw.com" <Sy.Damle@lw.com>, "Sarah.Tomkowiak@lw.com" <Sarah.Tomkowiak@lw.com>, "Alli.Stillman@lw.com" <Alli.Stillman@lw.com>, "Joe.Wetzel@lw.com" <Joe.Wetzel@lw.com>, "Laura.Bladow@lw.com" <Laura.Bladow@lw.com>, "Sara.Sampoli@lw.com" <Sara.Sampoli@lw.com>, "Thomas.Buettner@lw.com" <Thomas.Buettner@lw.com>
Subject: Cengage v. Google:

Counsel,

During the discovery conference today, we understand that you offered to provide Google with a list of domains connected with the noticed infringements alleged for the asserted works in this case. It would be helpful for Plaintiffs to provide this list in order to focus Google's investigation of a potential compromise on the "related" merchant dispute. Please let us know if Plaintiffs will provide the list mentioned at the conference.

Regards,
Holly

Holly Victorson
Pronouns: she/her/hers

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Attachment 1

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abbooks.shop	Modern style Shop
abbookz.shop	eBook Store
abdulhadim.mybigcommerce.com	abdulhadim
abebook.shop	Hypatia Shop
abebookz.shop	eBook Store
aberrockstar.com	Kaitlin Shop
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abtext.shop	eBook Store
abuapascolina.shop	abuapascolina
abubakarisa.mybigcommerce.com	abubakarisa
academicworld.online	e-book store
academicworld.shop	e-book store
academicworld.us	e-book store
academicworlds.com	eBook World
acbookssem.shop	Ebooks store
acolamoreen15.mybigcommerce.com	acolamoreen
acxedwardh.mybigcommerce.com	Acxedwardh
adolfoman.mybigcommerce.com	Adolfoman
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amaritiez.myshopify.com	amaritiez
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ebooksale.shop	Noah Shop
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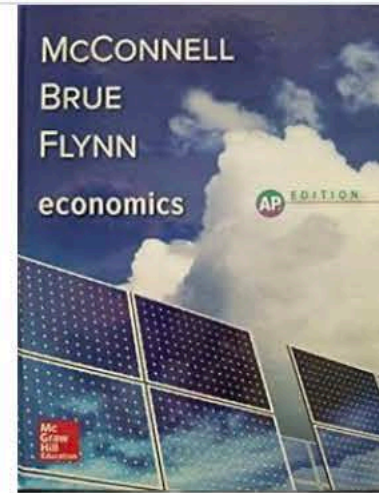


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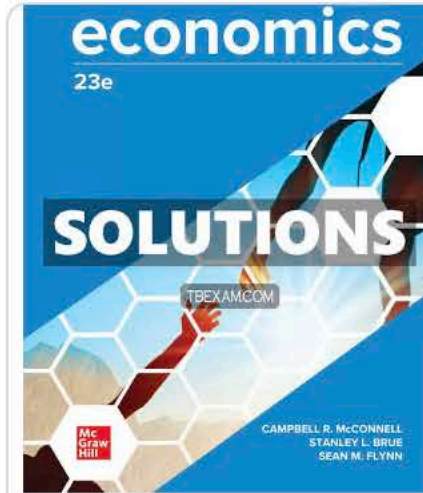


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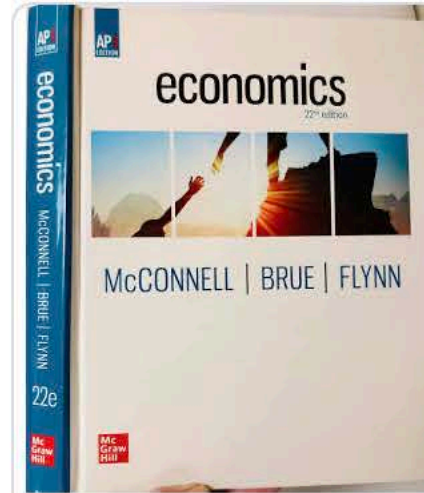


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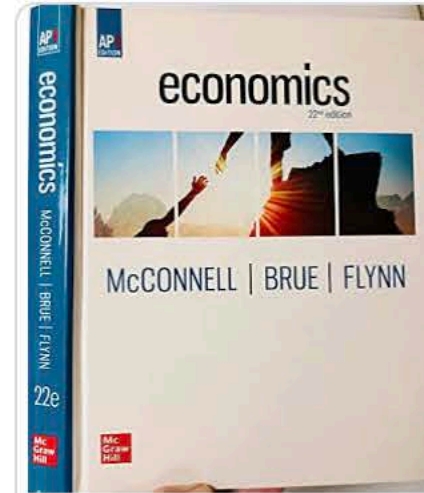


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